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Attorneys for Plaintiffs
**HIDDEN EMPIRE HOLDINGS, LLC;
HYPER ENGINE, LLC; AND DEON
TAYLOR**

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

HIDDEN EMPIRE HOLDINGS,
LLC; a Delaware limited liability
company; HYPER ENGINE, LLC; a
California limited liability company;
DEON TAYLOR, an individual,

Plaintiffs,

vs.

DARRICK ANGELONE, an
individual; AONE CREATIVE LLC,
formerly known as AONEE
ENTERTAINMENT LLC, a Florida
limited liability company; and ON
CHAIN INNOVATIONS LLC, a
Florida limited liability company,

Defendants.

AND RELATED CROSS-ACTIONS

CASE NO.: 2:22-cv-06515-MWF-AGR

**JOINT AGENDA REGARDING
INFORMAL DISCOVERY
CONFERENCE**

Date:	February 7, 2025
Time:	10:00 a.m. via Zoom
Courtroom:	550A
Judge:	Honorable Alicia Rosenberg

**TO THE HONORABLE COURT, THE PARTIES AND THEIR
ATTORNEYS OF RECORD:**

Plaintiffs HIDDEN EMPIRE HOLDINGS, LLC, HYPER ENGINE, LLC, and DEON TAYLOR, (collectively, “Plaintiffs”), Third-Party Defendant Roxanne Taylor (“Roxanne”), and Defendants DARRICK ANGELONE, AONE CREATIVE, LLC, and ON CHAIN INNOVATIONS, LLC (collectively, “Defendants”) (collectively, with Plaintiffs, the “Parties”) hereby submit the following Joint Agenda for the video Informal Discovery Conference (“IDC”) set for February 7, 2025 at 10:00 a.m. via Zoom.

The parties have requested this IDC for continued hearing regarding Plaintiff’s Ex Parte Application for Protective Order initially filed on March 15, 2023 (Dkt. 61). The Court initially entered an order staying Defendants’ third-party subpoenas on March 17, 2023 (Dkt. 63.) Following a continued discovery conference on August 29, 2023, the Court continued the stay on subpoenas as to forty (40) non-parties from which Defendants seek records, and asked the Parties to meet and confer to attempt to resolve their differences regarding the subpoenas. (Dkt. 104.)

Upon meeting and conferring, the Parties attempted to limit the number and scope of the subpoenas at issue. Defendants have agreed to withhold the subpoenas to the following individuals/entities: (1) Rogers & Cowan; (2) Michael Swartz; (3) Melissa Breau; (4) Justin Greystone; (5) Jeff Clanagan; (6) Geoff Shavitz; and (7) Heather Kritzer. In addition, Plaintiffs have stipulated to the service of subpoenas on the following individuals: (1) Amber Jones; (2) Damien Douglas; (3) Erin Murray; (4) John Ferry; (5) Kazuko Golden; and (6) Michael



1 Claps. However, the Parties do not agree on the scope of the document requests
2 to these six individuals.

3 As to the 27 remaining subpoenas at issue, the Parties further attempted to
4 meet and confer regarding limitations or possible withdrawal of subpoenas, but
5 have not been able to reach an agreement. Therefore, the Parties now request a
6 discovery conference to resolve these disputes.

7 To facilitate discussion regarding the subject subpoenas, attached is a table
8 identifying the 27 individuals/entities that are the subject of the disputed
9 subpoenas, as well as the disputed document requests for the six individuals upon
10 whom Plaintiffs have stipulated subpoenas can be served. A copy of the
11 aforementioned spreadsheet is attached hereto as **Exhibit "A"**.

12
13 Dated: February 06, 2025

**LAW OFFICES OF JT FOX &
ASSOCIATES, APC**

By: /s/ JT Fox
J.T. Fox, Esq.

Attorneys for Defendants, *Darrick
Angelone, AONE Creative, LLC, and
On Chain Innovations, LLC*

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20 Dated: February 06, 2025

KRAMER, DEBOER & KEANE

By: /s/ Sandra Calin
Sandra Calin, Esq.

Attorneys for Defendants *Darrick
Angelone, AONE Creative, LLC, and
On Chain Innovations, LLC*

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1 Dated: February 06, 2025

NEWELL LAW GROUP PC

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3 By: /s/ Felton T. Newell
4 Felton T. Newell, Esq.

5 Attorneys for Plaintiffs *Hidden*
6 *Empire Holdings, LLC, Hyper*
7 *Engine, LLC, Deon Taylor, And*
8 *Third-Party Defendant Roxanne*
9 *Taylor*
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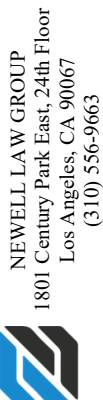


Exhibit A

Amber Jones	Former HEFG Employee	2021 - 2022	Documents and communications with all parties RE: (1) marketing and/or promotion of “Fear” film, (2) marketing and/or promotion of “Fear” game (3) the “House Next Door” Marketing Campaign, (4) the CNBC Vaccine Campaign, (5) Be Woke Vote, (6) “Black History in Two Minutes”, (7) the “Meet the Blacks” film, (8) “The Intruder” film, (9) the “Black and Blue” film, (10) the “Fatale” film, and (11) marketing and/or promotion of Hidden Empire Film Group films, including but not limited to emails, text messages, and other correspondence.
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Andrew Bachelor	Fear movie Producer/Freq HEFG & hyper engine collaborator	2016 - 2023	<p>Documents and communications Re: (1) marketing and/or promotion of “Fear” film, (2) marketing and/or promotion of “Fear” game, (3) Be Woke Vote, (4) the “Meet the Blacks” film, (5) “Black History in Two Minutes”, (6) Hyper Engine, and (7) marketing and/or promotion of Hidden Empire Film Group films.</p> <p>DOCUMENTS evidencing or related to Andrew Bachelor’s involvement with the “Fear” film, including but not limited to terms, term sheets, contracts, and/or agreements.</p>
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Clifford J Harris	Actor and partner in the Fear movie.	2020 - 2022	<p>Documents and communications RE: (1) marketing and/or promotion of “Fear” film, (2) marketing and/or promotion of “Fear” game, and (3) Be Woke Vote.</p> <p>DOCUMENTS related to Clifford Joseph Harris Jr’s involvement with the “Fear” film, including but not limited to terms, term sheets, contracts, and/or agreements.</p>
Damien Douglas	Former employee of HEFG	2018 - 2022	<p>Documents and communications Re: (1) involvement with “Fear” Marketing Campaign, (2) marketing and/or promotion of the “Fear” film, (3) marketing and/or promotion of Hidden Empire Film Group films, and (4) Be Woke Vote</p> <p>Any and all DOCUMENTS related to Damien Douglas’s involvement with the “Fear” film, including but not limited to terms, term sheets, contracts, and/or agreements.</p>

Damon Wolf	HEFG paid consultant. Worked. Aone collaborated with Damon on the marketing executed in relation to the theatrical release of the hefg film The House Next Door. Damon was engaged by HEFG to oversee the marketing plan for the theatrical release for the movie Fear. Damon approved the AONE marketing strategy and all the elements it included.	2018 - 2023	Documents and communications with Deon, Roxanne, Darrick, AONE, and Velma Sykes Re: (1) involvement with "Fear" Marketing Campaign, (2) involvement with "House Next Door" Marketing Campaign, (3) Hyper Engine, and (4) marketing and/or promotion of Hidden Empire Film Group films
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Erin Murray	former or current employee	2021 - 2022	Documents and communications with Deon, Roxanne, Darrick, AONE, and Hidden Empire Re: (1) the “Fear” film, (2) the “Fear” game (3) the “House Next Door” film, (4) the CNBC Vaccine Campaign, (5) Be Woke Vote (6) marketing and/or promotion of Hidden Empire Film Group films.
Evette Vargas	HEFG consultant.	2021 - 2022	Documents and communications with all parties Re: (1) Hyper Engine, (2) marketing and/or promotion of “Fear” film, (3) marketing and/or promotion of “Fear” game (4) non-fungible tokens (“NFTs”), (5) cryptocurrency marketing, (6) Blockchain marketing, (7) the company “Cube”, (8) Darrick Angelone, (9) AONE Creative, LLC (formerly known as AONE Entertainment, LLC, and (10) marketing and/or promotion of Hidden Empire Film Group films.

Henry Louis Gates	Narrator/Star of and owner of the Black History in Two Minutes series.	2017 - 2022	DOCUMENTS establishing ownership and/or containing ownership information regarding the series “Black History in Two Minutes”. Communications with Deon and Roxanne Re: (1) Hyper Engine, (2) marketing and/or promotion of Hidden Empire Film Group films, and (3) Black History in Two Minutes
Jacqui Burton	CNBC representative who executed contract for services with Hyper Engine. Identity revealed in email forwarded by Roxanne to Darrick on or about Dec. 30, 2021 regarding CNBC campaign.	2021 - 2023	Documents and communications with Deon, Roxanne, Quincy, and HEFG Re: (1) Hyper Engine, LLC, and (2) the vaccine campaign which Hidden Empire Holdings, LLC (formerly known as Hidden Empire Film Group) and/or Hyper Engine, LLC were engaged to work on

Eric Bishop aka Jamie Foxx	frequent HEFG and Hyper Engine collaborator.	2018 - 2023	<p>All documents and communications related to agreements or discussions concerning influencer marketing campaigns. Includes contracts for influencer marketing and records of payments made to or received from HEFG or Hyper Engine, specifically mentioning campaigns during 2018–2023.</p> <p>Documents or communications surrounding Jamie Foxx’s role in the Be Woke Vote 2018 campaign. Includes financial records, deliverables, contracts, and discussions with HEFG, Hyper Engine, or related parties.</p> <p>All documents related to Jamie Foxx’s collaborations with or involvement in projects managed by Hyper Engine or its representatives. Includes communications, agreements, or financial records tying Jamie Foxx to Hyper Engine initiatives during 2018–2023.</p>
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			<p>Any documents or communications referencing: The August 22, 2023, posting of a video recording of a private Zoom conversation in which Deon Taylor made statements critical of Jamie Foxx.</p> <p>Communications between Jamie Foxx, HEFG, Deon Taylor, Roxanne Taylor, or any representative discussing the impact of these alleged videos on business relationships.</p>
Jared Goetz	HEFG consultant 2021 - 2022	2021 - 2022	<p>All documents and communications involving Jared Goetz's collaboration with Hyper Engine, HEFG, and AONE, specifically related to: Marketing campaigns for Fear (2021–2022) and The House Next Door (2021). Other projects related to Bron Studios.</p> <p>All records, including calendars or notes, regarding: Meetings or communications involving Darrick Angelone, Quincy Newell, Kevin Weiss (Optimad), and Jared Goetz discussing HEFG/Hyper Engine</p>

			business or potential partnerships.
John Ferry	Former assistant to Deon and co-writer of the movie Fear	2018 - 2022	Documents and communications with all parties Re: (1) marketing and/or promotion of “Fear” film, (2) marketing and/or promotion of “Fear” game (3) the “House Next Door” Marketing Campaign, (4) the CNBC Vaccine Campaign, (5) Google email and/or web servers, and (6) marketing and/or promotion of Hidden Empire Film Group films.

Joseph Sikora	Actor and partner in the Fear movie.	2020 - 2022	<p>Any and all DOCUMENTS related to Joseph Sikora's involvement with the "Fear" film, including but not limited to terms, term sheets, contracts, and/or agreements.</p> <p>Communications with Deon, Roxanne, Quincy, and Hidden Empire Films Re: (1) marketing and/or promotion of "Fear" film, and (2) marketing and/or promotion of "Fear" game</p>
Kazuko Golden	former executive assistant to Roxanne	Jan 1 2016 - present	<p>Documents and communications with all parties related to (1) marketing and/or promotion of "Fear" film, (2) marketing and/or promotion of "Fear" game (3) the "House Next Door" Marketing Campaign, and (4) the CNBC Vaccine Campaign</p> <p>Any documents or communications referencing the alleged lockout of the Google Workspace or disputes involving AOne and HEFG during her employment.</p>

			<p>Documents or records showing her involvement in handling of digital assets, email systems, or Google Workspace accounts.</p>
Kristi Kilday	HEFG production partner on the development of a reality TV series surrounding the media personality, Master P.	2022 - 2023	<p>All documents and communications with Deon, Roxanne, HEFG related to, and/or evidencing the Untitled Scripted Series about Percy Miller (AKA "Master P").</p> <p>Any records or communications related to the timeline of this project, particularly from 2022 to 2023, which Plaintiffs claim was disrupted due to Defendants' alleged actions.</p> <p>All communications, agreements, or internal discussions referencing:</p>

			Disruptions allegedly caused by Darrick Angelone or AOne. Delays or complications attributed to the alleged inability of HEFG to conduct business.
Lionsgate	Distributor of the movies Traffik, Meet the Blacks, The house next door and Fatale. Client of Hyper Engine for Fatale.	Jan 1 2016 - December 2021	<p>All documents, contracts, or agreements related to the marketing or promotional activities for:</p> <p>Traffik Meet the Blacks The House Next Door Fatale</p> <p>All communications or agreements with Deon Taylor, Roxanne Taylor, HEFG, or Hyper Engine concerning the distribution or release of the above films.</p> <p>Documents relating to any services provided by Hyper Engine specifically for Fatale as a client of Lionsgate.</p>

Percy Miller aka Master P	HEFG production partner on the development of a reality TV series surrounding the media personality, Master P.	2022 - 2023	<p>All documents and communications with Deon, Roxanne, HEFG related to, and/or evidencing the Untitled Scripted Series about Percy Miller (AKA “Master P”).</p> <p>Any records or communications related to the timeline of this project, particularly from 2022 to 2023, which Plaintiffs claim was disrupted due to Defendants' alleged actions.</p> <p>All communications, notes, or internal discussions referencing: Disruptions allegedly caused by Darrick Angelone or AOne. Delays or complications attributed to the alleged inability of HEFG to conduct business.</p>
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Mayweather Promotions	HEFG production partner on the development of a reality TV series surrounding the boxer, Floyd Mayweather.	2022 - 2023	<p>Documents and communications with Deon, Roxanne, HEFG Re: (1) the “GOAT” Docuseries about professional boxer Floyd Mayweather, (2) TV and/or film projects, and (3) marketing and/or promotion of Hidden Empire Film Group films</p> <p>All documents referencing disruptions or delays in the project development attributed to actions allegedly caused by Darrick Angelone or AOne during the stated timeline.</p> <p>Documentation of the \$800,000+ transferred from the Hyper Engine bank account in September 2023, including invoices, contracts, or any supporting documentation tying this transaction to Mayweather Promotions.</p>
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McGee Media	Producer and owner of the Black History in Two Minutes series	2018 - present	<p>All documentation related to the ownership and production of the "Black History in Two Minutes" (BHITM) series.</p> <p>Communications detailing McGee Media's role in producing and owning BHITM.</p> <p>All documents related to interactions, agreements, or communications with HEFG, Deon Taylor, Roxanne Taylor, or Robert Smith regarding the production, marketing, or distribution of the BHITM series.</p>
Michael Claps	Former assistant to Roxanne	2018 - 2022	<p>Documents regarding the setup, management, and any changes to email accounts, including password reset requests performed by AOne/Darrick on behalf of HEFG or hyper engine.</p> <p>Records regarding access to digital assets, email systems, or Google Workspace accounts, particularly around the time of the alleged "lockout" or disputes concerning HEFG and Hyper</p>

			<p>Engine.</p> <p>Documents and communications with all parties regarding: (1) marketing and/or promotion of “Fear” film, (2) marketing and/or promotion of “Fear” game (3) the “House Next Door” Marketing Campaign, (4) the CNBC Vaccine Campaign</p>
Noquomas Wilson	Engaged by Roxanne to work for the CLIMB non-profit set up by Roxanne	2018 - 2022	<p>All documents and communications related to Noquomas Wilson’s role and activities for the CLIMB non-profit, including agreements, tasks, or job descriptions during their engagement from 2018 to 2022.</p> <p>Documents regarding the setup, management, and any changes to Noquomas Wilson’s email accounts, including password reset requests performed by AOne/Darrick on behalf of HEFG or CLIMB.</p>

			<p>Any communications with Roxanne Taylor, HEFG, or related parties about CLIMB's operations or its use of email or digital systems managed by AOne/Darrick.</p> <p>Any communications regarding (1) Be Woke Vote; (2) Hidden Empire Film Group Social Media; and (3) marketing and promotion of HEFG films.</p>
Robert Smith	<ul style="list-style-type: none">*Primary investor in HEFG and it's film projects*Partner on Hyper Engine 2018 OA*Owner of BHITM series*Client of Hyper Engine, AONE and Darrick	2016 - present	<p>All documents related to the ownership, distribution, and financial terms of the Black History in Two Minutes (BHITM) series.</p> <p>Documents related to the financing, terms, planning, and execution of the Be Woke Vote campaign.</p> <p>Documents regarding campaigns, including the election of Doug Jones for U.S. Senate in Alabama and Andrew Gillum for Governor of Florida.</p> <p>All documents related to donations made to Be Woke Vote and Roxanne's non-profit</p>

			<p>organization, CLIMB.</p> <p>Contracts, agreements, or communications regarding services engaged for or executed by AONE or Darrick Angelone on behalf of Robert Smith, HEFG, or Hyper Engine.</p>
Roland Martin	Be Woke Vote host 2018	2018	<p>All documents related to work done for and with the Be Woke Vote campaign during 2018.</p> <p>Contracts or agreements specifying Roland Martin's role and responsibilities as the host for Be Woke Vote.</p> <p>Communications, emails, and discussions related to Roland Martin's involvement in the campaign.</p> <p>Financial records, including</p>

			payments, reimbursements, or expenditures related to his role.
Screen Engine ASI	Data company which ran audience testing for HEFG films and which was also in negotiation with HEFG regarding a partnership of Screen Engine and Hyper Engine.	2018 - present	<p>All documents related to Hyper Engine and Screen Engine ASI's negotiations regarding a potential partnership.</p> <p>Contracts or agreements, draft or finalized, with Hyper Engine, HEFG, Deon Taylor, or Roxanne Taylor.</p> <p>All correspondence with Deon Taylor, Roxanne Taylor, or their representatives regarding services provided, partnership negotiations, or testing processes.</p>

Shandra Dixon	Former employee of HEFG one-time hyper engine payroll employee	2016 - 2022	<p>All communications and documentation regarding email setup and administration for Shandra Dixon by AONE/Darrick. Records of any email password resets or administrative requests involving Shandra Dixon.</p> <p>All emails or correspondence sent by or to Shandra Dixon related to (1) Hyper Engine, (2) marketing and/or promotion of “Fear” film, (3) marketing and/or promotion of “Fear” game (4) the “House Next Door” Marketing Campaign, (5) the CNBC Vaccine Campaign; and (6) marketing or promotion of HEFG films</p>
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Shawn Edwards	Former media consultant of HEFG	2017 - 2022	<p>All documents involving Hyper Engine, including marketing or collaborative efforts with Shawn Edwards.</p> <p>All communications and documentation regarding email setup and administration for by AONE/Darrick.</p> <p>Records of any email password resets or administrative requests.</p> <p>All documents and communications regarding the marketing or promotion of the following movies or projects: Traffik Black and Blue The Intruder Fatale The House Next Door Be Woke Vote campaigns (2018 and 2020). Black History in Two Minutes.</p>
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Sony	Distributor of the movies the intruder and black and blue. Client of Hyper Engine for Black and Blue.	2018 - 2019	<p>All documents related to Sony's engagement with Hyper Engine for marketing services.</p> <p>All documents regarding the marketing and promotion of the movies: The Intruder Black and Blue</p> <p>All documents related to or involving Hyper Engine in connection with Sony.</p>
Suzanne Summerville	Consultant to HEFG and Hyper engine during be woke 2018 and all films through June 2020	2017 - 2020	<p>All documents and communications with Deon, Roxanne, Darrick, and HEFG regarding the marketing or promotion of the following movies or projects: Traffik Black and Blue The Intruder Fatale The House Next Door Be Woke Vote campaigns (2018 and 2020). Black History in Two Minutes.</p> <p>All documents and communications related to the setup and ongoing administration of email accounts for Suzanne</p>

			Summerville or her work with HEFG and Hyper Engine.
Terrence Jenkins	Fear movie Producer/Freq HEFG & hyper engine collaborator	2020 - Present	<p>All documents related to Terrence Jenkins' involvement and participation in the production of the movie Fear.</p> <p>All documents related to any agreements, discussions, or contracts involving influencer marketing.</p> <p>Any documents reflecting payments made to or from HEFG or Hyper Engine for influencer marketing activities.</p>

Twentyone 14 llc	Quincy Newall's consulting company. Consultant company which was who HEFG engaged Quincy Newall through to act as COO of HEFG	2021 - present	<p>All documents and communications regarding Hyper Engine and engagement with HEFG or Hyper Engine</p> <p>All documents regarding the marketing or promotion of The House Next Door and Fear.</p> <p>Documents and payment records surrounding Quincy Newall's engagement with HEFG through Twentyone 14 LLC and his scope of work.</p> <p>Any documents related to discussions between Hyper Engine and Screen Engine involving Twentyone 14 LLC.</p>
Van Jones	Host of Be Woke Vote 2018 campaign video series HEFG/Hyper Engine invested in his film project	2018 - present	<p>All documents or communications related to the Be Woke Vote 2018 campaign video series involving Van Jones.</p> <p>Documents or communications surrounding any and all engagements of Van Jones by HEFG, Hyper Engine, Be Woke, or any other subsidiary or partner of HEFG, Deon, and Roxanne.</p>

Warner Bros	Negotiated but failed to engage Hyper Engine for marketing services for the Warner Bros film, Motherless Brooklyn	2019	<p>All documents related to Hyper Engine's involvement, including discussions, agreements, or negotiations concerning Warner Bros.</p> <p>Any communications or records involving Deon Taylor or Roxanne Taylor in relation to Warner Bros or Hyper Engine.</p> <p>All documents specifically related to the marketing efforts or negotiations for the Warner Bros film, Motherless Brooklyn</p>
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